

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KATHARYN KALMBACH, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

NATIONAL RIFLE ASSOCIATION OF
AMERICA, a New York Corporation, and
INFOCISION, INC. d/b/a InfoCision
Management Corporation, a Delaware
Corporation,

Defendants.

) Case No.

) (King County Superior Court
) Case No. 17-2-03381-2)

) **DECLARATION OF MICHAEL**
) **WHITE IN SUPPORT OF**
) **DEFENDANTS' NOTICE OF**
) **REMOVAL**

1. My name is Michael White. I am currently the Chief Technology Officer for InfoCision, Inc. ("InfoCision"), a position I have held since 1989.

2. As the CTO, I am responsible for and oversee InfoCision's Information Technology, including its database that keeps records related to InfoCision's fundraising campaigns and its volunteer-recruitment campaigns.

3. I have personal knowledge of the facts in this Declaration, and am competent to testify thereto.

4. InfoCision staff under my supervision queried InfoCision's database to determine the number of calls that the company placed to Washington area codes on the NRA's behalf.

DECLARATION
CASE NO.

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1 5. The information retrieved from the database reflects that between February 9,
2 2013 and February 9, 2017, InfoCision placed more than 10,000 calls to phone numbers with the
3 following Washington State area codes: 206, 253, 360, 425, 509, and 564.

4
5 I, Michael White, hereby declare under penalty of perjury that the foregoing is true and correct to
6 the best of my knowledge, information, and belief.

7 Executed on: March 14, 2017

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/s/ MICHAEL WHITE

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2017, I electronically filed the foregoing DECLARATION OF MICHAEL WHITE with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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